

APR 27 1995

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ORIGINAL

In the Matter of)	
)	
Billed Party Preference)	CC Docket No. 92-77
for 0+ InterLATA Calls)	
)	
Disclosures by Operator)	RM-8606
Service Providers Serving)	
Public Phones)	DOCKET FILE COPY ORIGINAL

REPLY COMMENTS

MCI Telecommunications Corporation (MCI) hereby submits its reply comments in the above-referenced proceeding. The comments filed demonstrate that the Joint Petitioners' rate ceiling proposal is not in the public interest because it would not benefit consumers or promote competition and, therefore, should be discarded. In addition, the comments demonstrate that the National Association of Attorneys General (NAAG) proposed disclosure message would impose an unnecessary requirement on operator service providers (OSPs) who comply with existing rules and would not prevent abuses by those who do not. Therefore, this proposal also should be rejected.

With regard to the rate ceiling proposal, MCI and others have shown that "rate gouging" is not the only remaining concern affecting the operator services market and that a rate ceiling would do nothing to eliminate the other problems. In addition, most of the Joint Petitioners' proposed rates are significantly higher than the current

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operator services rates charged by the major interexchange carriers. Therefore, in the eyes of most consumers, the Joint Petitioners' proposal would not resolve the problem of "rate gouging." Rather, consumers still could be charged rates in excess of those reasonably anticipated; however, those rates will have been sanctioned by the Commission.

The comments also demonstrate that, contrary to the Joint Petitioners' assertions, a rate ceiling would not be an administratively simple thing to implement or enforce. Not only would the Commission have to conduct proceedings to establish the ceiling, which likely would be challenged in court, it would have to conduct proceedings in connection with OSPs who charge rates in excess of the ceiling. And, the Commission would have to expend considerable resources enforcing the rate ceiling if it is to be at all effective.

Finally, the rate ceiling concept is not an effective substitute for billed party preference (BPP) because it would not provide consumers with the competitive benefits that BPP offers. Only with implementation of BPP will consumers be able to reach their carrier-of-choice through the convenience of 0+ dialing; will "equal access" be achieved in the operator services market; and will the competitive advantages which are the vestiges of AT&T's monopoly be eliminated.

Thus, the facts have been presented; the positions of the parties are well known; and it is time for the

Commission to decide whether it will protect consumers and encourage true competition, or whether it will continue to protect some industry participants. Applying the public interest standard, there really is no choice -- the Commission must implement BPP.

A number of commenters support MCI in opposing the NAAG's proposal because it would not be effective in preventing operator services abuses and it would unnecessarily burden law-abiding OSPs. As demonstrated, under current requirements, OSPs must charge reasonable rates and disclose rate information on request. Thus, for carriers complying with the existing rules, the NAAG's proposal would impose an unnecessary regulatory burden that would increase carrier costs which, ultimately, would result in higher rates for consumers. Moreover, carriers not complying with the current requirements are not likely to comply with the NAAG's proposal. Accordingly, the NAAG's proposal should be rejected.


Based on the foregoing and MCI's initial comments, MCI urges the Commission to reject the Joint Petitioners' ex

parte and the NAAG's petition and, instead, promptly order the implementation of BPP.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By:



Mary J. Sisak
Donald J. Elardo
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2605

Dated: April 27, 1995

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 27th day of April 1995, copies of the foregoing "**REPLY COMMENTS**" in CC Docket No. 92-77 and RM 8606 were served by first-class mail, postage prepaid, unless otherwise indicated, upon the parties on the attached list.


Vernell V. Garey

*--HAND DELIVERED

Mark Nadel*
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 514
Washington, D.C. 20554

George A. Christenberry, Jr.
Deputy Commissioner
Department of Administrative Services
Telecommunications Division
200 Piedmont Avenue
Suite 1402, West Tower
Atlanta, GA 30334-5540

Bob Starks
Representative, 38th District
Florida House of Representatives
1312 Palmetto Avenue
Winter Park, FL 32789

Richard M. Walsh
Special Assistant for Computer
Information Systems
Office of Administration
Commonwealth of Pennsylvania
Governor's Office
204 Finance Building
Harrisburg, PA 17120

Robert K. Johnson
Deputy Consumer Counselor
Indiana Office of Utility Consumer Counselor
Indiana Government Center
N501 100 North Senate Avenue
Indianapolis, IN 46204

Irwin A. Popowsky
Consumer Advocate
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Eileen E. Huggard, Esq.
New York City Department of
Telecommunications and Energy
75 Park Place, Sixth Floor
New York, NY 10007

Perry R. Eichor
Secretary
South Carolina Jail Administrators Association
703 Almond Drive
Simpsonville, SC 29682-3453

Barney C. Parrella
Senior Vice President
Economics and International Affairs
Airports Association Council
International, North America
1220 19th Street, N.W.
Suite 200
Washington, D.C. 20036

Ian D. Volner
Cohn and Marks
Suite 600
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036
Of Counsel:
Airports Association Council
International, North America

Alan J. Thiemann
Taylor Thiemann & Aitken
908 King Street, Suite 300
Alexandria, VA 22314
Attorney for the National
Association of Convenience Stores

Keith J. Roland
Roland, Fogel, Koblenz & Carr
One Columbia Place
Albany, NY 12207
Attorney for the Independent Payphone
Association of New York, Inc.

John F. Dodd
 Brad I. Pearson
 Smith, Gill, Fisher & Butts
 One Kansas City Place
 1200 Main Street, 35th Floor
 Kansas City, MO 64105-2152
 Attorneys for the Independent
 Network, Inc. and American
 Telemanagement, Inc.

Gary Joseph
 Vice President - Communications
 National Brands, Inc.
 d/b/a Sharenet Communications Company
 4633 West Polk Street
 Phoenix, AZ 85043

Benjamin J. Griffin
 Lynn E. Shapiro
 Reed Smith Shaw & McClay
 1200 18th Street, N.W.
 Washington, D.C. 20036
 Attorneys for South Carolina Division
 of Information Resources Management

Stephen G. Kraskin
 2120 L Street, N.W., Suite 300
 Washington, D.C. 20037
 Attorney for U.S. Intelco Networks, Inc.

Rick L. Anthony
 Executive Vice President
 Quest Communications Corporation
 8829 Bond Street
 Shawnee Mission, KS 66214-1707

Maurice D. Murphy
 Associate Director
 Harvard University
 Office of Information Technology
 10 Ware Street
 Cambridge, MA 02138

Veronica M. Ahern
 Nixon, Hargrave, Devans & Doyle
 One Thomas Circle, Suite 800
 Washington, D.C. 20005
 Attorney for the Illinois Department
 of Central Management Services, Bureau of
 Communications & Computer Services

Scott R. O'Donnell
 Director
 Department of Aviation
 County of Allegheny
 Room M 134, Terminal Building
 Greater Pittsburgh International Airport
 Pittsburgh, PA 15231

John B. Mow
 President
 Chief Executive officer
 Advanced Business Communications
 4801 Spring Valley
 Suite 105A
 Dallas, TX 75244

Randolph J. May
 Elizabeth C. Buckingham
 Sutherland, Asbill & Brennan
 1275 Pennsylvania Avenue, N.W.
 Washington, D.C. 20004-2404
 Attorneys for the Advanced Technologies
 Cellular Telecommunications, Inc.

William M. Barvick
 Bar Number 17893
 231 Madison Street
 Jefferson City, MO 65101
 Attorney for Midwest Independent Coin
 Payphone Association

Mark J. Angell
 Vice President
 Universal Technology & Communications
 Corporation
 10940 Laureate Drive, Suite 8300
 San Antonio, TX 78249-3343
 Thomas P. Engel
 Director of Airports
 County of Sacramento
 Department of Airports
 6900 Airport Boulevard
 Sacramento, CA 95837

Krys T. Bart
 Assistant Director
 City of Fresno
 2401 N. Ashley Way
 Fresno, CA 93727-1504

Robert N. Broadbent
 Director
 Department of Aviation
 McCarran International Airport
 P.O. Box 11005
 Las Vegas, NV 89111

G.A. Barron, Jr.
 President/General Manager
 Portland 76 Auto/Truck Plaza Inc.
 21856 Bents Road, N.E.
 1-5, Exit 278
 Aurora, OR 97002

Gerald K. Olson, A.A.E.
 Cheyenne Airport Manager
 Cheyenne Airport
 P.O. Box 2210
 200 East 8th Avenue
 Cheyenne, WY 82003-2210

Eddie F. Storer
 Airport Manager
 Natrona County International Airport
 8500 Fuller Street
 Casper, WY 82604-1697

Patricia A. Simmons
 Telecommunications Officer
 Office of Systems and Computing Services
 Renne Library Basement
 Montana State University
 Bozeman, MT 59717-0324

Louis E. Miller
 Director of Airports
 Salt Lake City Airport Authority
 AMF Box 22084
 Salt Lake City, UT 84122

C.M. Armour, President
 Southeast Chapter, American Association
 of Airport Executives (SEC AAAE)
 Southwest Georgia Regional Airport
 3905 Newton Road
 Albany, GA 31707

Douglas N. Owens
 4705 16th Street, N.E.
 Seattle, WA 98105
 Attorney for Northwest Pay Phone Association

Stanley F. Bates
 Assistant Director
 Arizona Department of Corrections
 1601 West Jefferson Street
 Phoenix, AZ 85007-3003

O. Lane McCotter
 Executive Director
 Utah Department of Corrections
 6100 South 300 East
 Murray, UT 84107

Albert H. Kramer
 Robert F. Aldrich
 Helen M. Hall
 Keck, Mahin & Cate
 1201 New York Avenue, N.W.
 Washington, D.C. 20005-3919
 Attorneys for American Public
 Communications Council, North American
 Telecommunications Association

Richard G. Kiebusch
 President
 American Jail Association
 1000 Day Road, Suite 100
 Hagerstown, MD 21740

Bern E. Case, A.A.E.
 Director of Aviation
 Lubbock International Airport
 Route 3, Box 389
 Lubbock, TX 79401

Jerry L. McMichael, A.A.E.
 Executive Vice President
 Finance and Administration
 Memphis-Shelby County Airport Authority
 Office Memphis International Airport
 P.O. Box 30168
 Memphis, TN 38130-0168

Robert H. Waddle, AAE
 Executive Director
 Columbia Metropolitan Airport
 P.O. Box 280037
 Columbia, SC 29228-0037

John W. Priest
 Chairman & Chief Executive Officer
 ComCentral Corp.
 2150 Whitfield Industrial Way
 Sarasota, FL 34243-4046

Richard L. Goldberg
 Graham & James
 One Maritime Plaza, Third Floor
 San Francisco, CA 94111
 Attorney for California Payphone Association

John J. Huber, Counsel
 Petroleum Marketers Association of America
 1101 16th Street N.W., 2nd Floor
 Washington, D.C. 20036

Pamela J. Brandon, Division Administrator
 Wisconsin Department of Corrections
 149 E. Wilson Street
 P.O. Box 7925
 Madison, WI 53707

Erin E. Ostler
 Vice President
 Strategic Alliances, Inc.
 2353 Rice Street, Suite 106
 Roseville, MN 55113

Robert C. Dickhaus
 President
 Telephone Operating Systems, Inc.
 P.O. Box 888048
 Atlanta, GA 30356-0048

John W. Priest
 Chairman & Chief Executive Officer
 Teltronics, Inc.
 2150 Whitfield Industrial Way
 Sarasota, FL 34243-4046

Brent A. Kitchen
 Airports Director
 Tulsa Airport Authority
 Tulsa International Airport
 P.O. Box 581838
 Tulsa, OK 74158

Emily Regnier
 Airport Properties Department
 Oakland International Airport
 Port of Oakland
 530 Water Street
 Jack London's Waterfront
 P.O. Box 2064
 Oakland, CA 94604-2064

Vernell Sturns
 Executive Director
 Dallas/Fort Worth International Airport
 P.O. Drawer DFW
 Dallas/Fort Worth Airport, TX 75261

Jean L. Kiddo
 Ann P. Morton
 Swidler & Berlin, Chtd.
 3000 K Street, N.W., Suite 300
 Washington, D.C. 20007
 Attorneys for the Greater Orlando
 Aviation Authority

Hugh J. Macbeth
 Manager, Telecommunications
 Greater Orlando Aviation Authority
 One Airport Blvd.
 Orlando, FL 32827-4399

Steve Schude
 President
 Advanced Payphoen Systems, Inc.
 535 W. Iron Avenue, Suite 122
 Mesa, AZ 85210

Nanci Adler
 Technologies Management, Inc.
 163 E. Morse Boulevard
 Winter Park, FL 32789
 Consultant to Advanced Payphone Systems

Robert C. Whit
 Executive Director
 Airport Authority of Washoe County
 Reno Stead Airport
 Box 12490
 Reno, NV 89510

Douglas E. Neel
 Vice President
 Regulatory Affairs
 MessagePhone, Inc.
 5910 N. Central Expressway
 Suite 1575
 Dallas, TX 75206

Rowland L. Curry
 Director
 Telephone Utility Analysis Division
 Public Utility Commission of Texas
 7800 Shoal Creek Boulevard
 Austin, TX 78757

Colleen M. Dale
 Senior Counsel
 Missouri Public Service Commission
 P.O. Box 360
 Jefferson City, MO 65102

Ellen M. Averett
 Veronica A. Smith
 John F. Povilaitis
 P.O. Box 3265
 G-28, North Office Building
 Harrisburg, PA 17105-3265
 Attorneys for the Pennsylvania Public
 Utility Commission

Ronald G. Choura, Supervisor
 Olga Lozano, Analyst
 Telecommunications Section
 Policy Division
 Michigan Public Service Commission
 P.O. Box 30221
 Lansing, MI 48909-7721

Darrell S. Townsley
 Special Assistant Attorney General
 Illinois Commerce Commission
 180 North LaSalle Street
 Suite 810
 Chicago, IL 60601

James R. Monk, Chairman
 Indiana Utility Regulatory Commission
 302 W. Washington Street
 Suite E306
 Indianapolis, IN 46204

James B. Gainer, Section Chief
 Ann E. Henkener
 Assistant Attorney General
 Public Utilities Section
 180 East Broad Street
 Columbus, OH 43266

Cheryl L. Parrino, Chairman
 Public Service Commission of Wisconsin
 4802 Sheboygan Avenue
 P.O. Box 7854
 Madison, WI 53707

Brian J. Kinsella
 Thomas F. Youngblood
 American Hotel & Motel Association
 1201 New York Avenue, N.W.
 Washington, D.C. 20005-3931

William E. Wyrrough, Jr.
 Associate General Counsel
 Florida Public Service Commission
 101 East Gaines Street
 Tallahassee, FL 32399-0850

Josephine S. Trubek
 Rochester Tel Center
 180 South Clinton Avenue
 Rochester, NY 14646-0700
 Attorney for the RCI Long Distance, Inc.

Rochelle D. Jones
 Director-Regulatory
 227 Church Street, 4th Floor
 New Haven, CT 065104

Robert M. Lynch
 Richard C. Hartgrove
 John Paul Walters, Jr.
 One Bell Center, Room 3520
 St. Louis, MO 63101
 Attorneys for Southwestern Bell
 Telephone Company

Leon M. Kestenbaum
 Jay C. Keithley
 H. Richard Juhnke
 1850 M Street, N.W., 11th Floor
 Washington, D.C. 20036
 Attorneys for Sprint Corporation

Craig T. Smith
 P.O. Box 11315
 Kansas City, MO 64112
 Attorney for Sprint Corporation

Mary McDermott
 Vice President & General Counsel
 Linda Kent
 Associate General Counsel
 900 15th Street, N.W., Suite 800
 Washington, D.C. 20006-2105
 Attorneys for the United States Telephone
 Association

Lawrence E. Sarjeant
 Randall S. Coleman
 1020 19th Street, N.W., Suite 700
 Washington, D.C. 20036
 Attorneys for U.S. West Communications, Inc.

Walter Steimel, Jr.
 Fish & Richardson
 601 13th Street, N.W.
 5th Floor North
 Washington, D.C. 20005
 Attorneys for Pilgrim Telephone, Inc.

James P. Tuthill
 Nancy C. Woolf
 140 New Montgomery Street
 Room 1523
 San Francisco, CA 94105
 Attorneys for Pacific Bell and Nevada Bell

James L. Wurtz
 1275 Pennsylvania Avenue, N.W.
 Washington, D.C. 20004
 Attorney for Pacific Bell and Nevada Bell

Lisa M. Zaina
 General Counsel
 Organization for the Protection and
 Advancement of Small Telephone Companies
 21 Dupont Circle, N.W., Suite 700
 Washington, D.C. 20036

Patrick A. Lee
 Edward E. Niehoff
 120 Bloomingdale Road
 White Plains, NY 10605
 Attorneys for New York Telephone
 Company and New England Telephone and
 Telegraph Company

Gail L. Polivy
 1850 M Street, N.W.
 Suite 1200
 Washington, D.C. 20036
 Attorney for GTE Service Corporation
 and its affiliated GTE domestic telephone
 operating companies

Richard E. Wiley
 Danny E. Adams
 Brad E. Mutschelknaus
 Wiley, Rein & Fielding
 1776 K Street, N.W.
 Washington, D.C. 20006
 Attorneys for Competitive
 Telecommunications Association

Genevieve Morelli
 Vice President and General Counsel
 Competitive Telecommunications Association
 1140 Connecticut Avenue, N.W.
 Suite 220
 Washington, D.C. 20036

Frank M. Panek
 John T. Lenahan
 Larry A. Peck
 2000 W. Ameritech Center Drive
 Room 4H86
 Hoffman Estates, IL 60196-1025

John M. Goodman
Edward D. Young, III
1710 H Street, N.W.
Washington, D.C. 20006
Attorneys for the Bell Atlantic
Telephone Companies

M. Robert Sutherland
Richard M. Sbaratta
Helen A. Shockey
Suite 1800
1155 Peachtree Street, N.W.
Atlanta, GA 30367-6000

Debra L. Lagapa
Mary K. O'Connell
Morrison & Foerster
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006
Attorneys for MasterCard International
Incorporated and VISA U.S.A., Inc.

Mark C. Rosenblum
Robert J. McKee
Richard H. Rubin
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920
Attorneys for American Telephone and
Telegraph Company

Roy L. Morris
Deputy General Counsel
Allnet Communications Services, Inc.
1990 M Street, N.W.
Suite 500
Washington, D.C. 20036

Randolph J. May
David A. Gross
Elizabeth C. Buckingham
Sutherland, Asbill & Brennan
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2404

Jean L. Kiddoo
Ann P. Morton
Swidler & Berlin, Chtd.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Attorneys for Cleartel
Communications, Inc., Com Systems, Inc.,
International Pacific, Inc. and Teltrust
Communications Services, Inc.

Greg Casey
Senior Vice President
Regulatory Affairs
Jane A. Fisher, Director
Federal Regulatory (Acting)
International Telecharge, Inc.
6706 Democracy Boulevard
Bethesda, MD 20817

Brad Mutschelknaus
Danny E. Adams
Rachel J. Rothstein
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
Attorneys for International Telecharge, Inc.
and U.S. Long Distance, Inc.

Judith St. Ledger-Roty
Michael R. Wack
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036
Attorneys for Intellicall, Inc.

John A. Ligon
Law Office of John Ligon
128 Mount Hebron Avenue
P.O. Box 880
Upper Montclair, NJ 07043
Attorney for Comtel Computer Corporation

Paul C. Besozzi
Besozzi & Gavin
1901 L Street, N.W., Suite 200
Washington, D.C. 20036
Attorney for Polar Communications Corporation

Steven J. Hogan
President and CEO
LinkUSA
210 2nd Street, S.E., Suite 400
Cedar Rapids, IA 52401

W. Audie Long
Senior Vice President
Legal & Regulatory
U.S. Long Distance, Inc.
9311 San Pedro
Suite 300
San Antonio, TX 78216

James D. Heflinger
Vice President and General Counsel
LiTel Telecommunications Corporation
d/b/a LCI International
4650 Lakehurst Court
Bublin, OH 43017

Charles P. Miller
General Counsel
Value-Added Communications, Inc.
1901 So. Meyers Road, Suite 530
Oakbrook Terrace, IL 60181

Randall B. Lowe
Charles H. N. Kallenbach
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, D.C. 20005-2088
Attorneys for One Call Communiciaons, Inc.
d/b/a OPTICOM

Douglas E. Neel
Vice President
Regulatory Affairs
MessagePhone, Inc.
5910 N. Central Expressway
Suite 1575
Dallas, TX 75206

Mitchell F. Brecher
Dow, Lohnes & Albertson
1255 Twenty-Third Street, N.W.
Washington, D.C. 20037
Attorneys for PhoneTel Technologies, Inc.

Jack R. McFadden
Director, Telecommunications Policy
and Planning
Office of Information Resources
State of Tennessee Department of Finance and Administration
598 James Robertson Parkway
Nashville, TN 37243-0560

Mark W. Kelly
Vice Chairman/President
Thomas W. Wilson
Sr. Vice President
Strategic Planning
Polar Communications Corporation
300 Corporate Center Drive
Manalapan, NJ 07726

Walter Steimel, Jr.
Fish & Richardson
601 13th Street, N.W.
5th Floor North
Washington, D.C. 20005
Attorneys for Pilgrim Telephone, Inc.

William D. Catoe
President
South Carolina Correctional Association
P.O. Box 210603
Columbia, SC 29221

Laurie D. Morse
Property Manager
Monterrey Peninsula Airport District
P.O. Box 550
Monterey, CA 93940

James D. Dronsfield
Director, Telecommunications
Duke University
106 Science Drive
Room 129 Tel-com
Durham, NC 27706

Angela Gittens
Deputy Director of Airports
Business and Finance
San Francisco International Airport
P.O. Box 8097
San Francisco, CA 94128

Judy Baar Topinka
State Senator -- 22nd District
Illinois State Senate
8609 W. Cermak Road
North Riverside, IL 60546

Jack A. McLean
President
Richfield Truck Stop
P.O. Box 26 Holy Hill Exit
US 41-45 State 167 West
Richfield, WI 53076

Morton Berlan
MIT Information Systems
77 Massachusetts Ave., E19-738
Cambridge, MA 02139

Glenn B. Manishin
Neil S. Ende
Blumenfeld & Cohen
1615 M Street, N.W., Suite 700
Washington, D.C. 20036
Attorneys for Gateway Technologies, Inc.

Charles H. Helein
General Counsel
Helein & Waysdorf, P.C.
1850 M Street, N.W., Suite 550
Washington, D.C. 20036
Attorney for America's Carriers
Telecommunications Association

Walt Saprnov
Charles A. Hudak
Gerry, Friend & Saprnov
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131
Attorneys for Interlink Telecommunications, Inc.

Kenneth F. Melley, Jr.
Director of Regulatory Affairs
U.S. Long Distance, Inc.
9311 San Pedro, Suite 300
San Antonio, TX 78216

Mitchell F. Brecher
Donelan, Cleary, Wood & Maser, P.C.
1275 K Street, N.W., Suite 850
Washington, D.C. 20005-4078
Attorney for Oncor Communications, Inc.

J. Manning Lee
Senior Regulatory Counsel
Teleport Communications Group, Inc.
2 Teleport Drive
Staten Island, NY 10311

David Cosson
L. Marie Guillory
National Telephone Cooperative Association
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Douglas F. Brent
Associate Counsel
9300 Shelbyville Road
Suite 700
Louisville, KY 40222
Attorney for LDDS Communications, Inc.

Edward R. Wholl
William J. Balcerski
New York Telephone Company and
New England Telephone and
Telegraph Company
120 Bloomingdale Road
White Plains, NY 10605

Catherine R. Sloan
Vice-President, Federal Affairs
1825 I Street, N.W.
Suite 400
Washington, D.C. 20006
Attorney for LDDS Communications, Inc.

Debra Berlyn, Executive Director
National Association of State Utility
Consumer Advocates
1133 15th Street, N.W., Suite 575
Washington, D.C. 20005

Branson Telephone
P.O. Box 1944
Branson, MO 65615

Kathy L. Shobert
Director, Federal Regulatory Affairs
General Communications, Inc.
901 15th Street, N.W., Suite 900
Washington, D.C. 20005

Gregg C. Sayre
Attorney for Rochester Telephone
Corporation
180 South Clinton Avenue
Rochester, NY 14646

William D. Baskett, III
John K. Rose
Frost & Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202
Attorneys for Cincinnati Bell Telephone

Anne U. MacClintock
Vice President - Regulatory Affairs
& Public Policy
The Southern New England Telephone Company
227 Church Street
New Haven, CT 06510

Robert E. Sigmon
Cincinnati Bell Telephone
201 E. Fourth Street
P.O. Box 2301
Cincinnati, OH 45201

James U. Troup
Arter & Hadden
1801 K Street, N.W., Suite 400K
Washington, D.C. 20006
Attorney for Iowa Network Services, Inc.

Paul J. Berman
 Alane C. Weizel
 Covington & Burlig
 1201 Pennsylvania Avenue, N.W.
 P.O. Box 7566
 Washington, D.C. 20044-7566
 Attorneys for Anchorage Telephone Utility

Bob Schoonmaker
 Vice President
 GVNW Inc./Management
 P.O. Box 25969
 Colorado Springs, CO 80936

Anthony Marquez
 First Assistant Attorney General
 Colorado Public Utilities Commission
 1580 Logan Street, Office Level 2
 Denver, CO 80203

Daniel J. Rooks
 4250 Blackland Drive
 Marietta, GA 30067

Paul Rodgers, General Counsel
 Charles D. Gray, Assistant General Counsel
 James Bradford Ramsay, Deputy Assistant
 General Counsel
 National Association of Regulatory Utility
 Commission
 1102 ICC Building
 Post Office Box 684
 Washington, D.C. 20044

Trudi J. Renwick, Ph.D.
 Economic Policy Analyst
 Public Utility Law Project of New York, Inc.
 Pieter Schuyler Financial Center
 39 Columbia Street
 Albany, NY 12207-2717

Eugene F. Mullin
 Christopher A. Holt
 Mullin, Rhyne, Emmons and Topel, P.C.
 1225 Connecticut Avenue, N.W., Suite 300
 Washington, D.C. 20036-2604
 Attorneys for Citizens United for
 Rehabilitation of Errants

Cheryl A. Tritt
 Morrison & Foerster
 2000 Pennsylvania Avenue, N.W., Suite 5500
 Washington, D.C. 20006
 Attorney for Citizens United for
 Rehabilitation of Errants

Donald L. Howell, II
 Deputy Attorney General
 Idaho Public Utilities Commission
 472 West Washington Street
 Boise, ID 83702

Gregory M. Casey
 Senior Vice President
 Regulatory and Telephone Company Relations
 Oncor Communications, Inc.
 6707 Democracy Boulevard
 Bethesda, MD 20817

Kirk Smith
 President
 Operator Service Company
 1624 Tenth Street
 Lubbock, TX 79401

Connie Wightman
 Consultant to U.S. Osiris Corporation
 P.O. Drawer 200
 Winter Park, FL 32790-0200

Michael J. Shortley, III
Attorney for Frontier Communications
International Inc.
180 South Clinton Avenue
Rochester, NY 14646

Steven E. Swenson
Counsel for TelTrust
TelTrust Communications Services
221 North Charles Lindbergh Drive
Salt Lake City, UT 84116

Cynthia B. Miller
Associate General Counsel
Public Service Commission
State of Florida
Fletcher Building
101 East Gaines Street
Tallahassee, FL 32399-0850

Gary L. Phillips
Attorney for Ameritech
Ameritech
1401 H Street, N.W., Suite 1020
Washington, D.C. 20005